REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application and indicating that claims 23-38 are allowable and that claims 9-17 and 44 contain allowable subject matter.

Disposition of Claims

Claims 1-46 are pending in this application. Claims 1, 23, and 39 are independent. The remaining claims depend, directly or indirectly, from claims 1, 23, and 39.

Rejection(s) under 35 U.S.C § 112

Claims 39-46 stand rejected under 35 U.S.C. § 112 as indefinite. Claim 39 has been amended in this reply to correct the antecedent basis issued raised by the Examiner. Accordingly, claims 39-46 point out and distinctly claim the subject matter which the applicant regards as the invention. In view of the above, withdrawal of this rejection is respectfully requested.

Rejection(s) under 35 U.S.C § 103

Claims 1-8, 18-22, 39-43, 45 and 46 stand rejected under 35 U.S.C. § 103 as obvious over U.S. Patent 6,262,713 (hereafter "Brusky") in view of IBM TDB "Technique to Move Focus in Presentation Manager Applications" (hereafter "IBM"). Claim 39 has been amended in this reply to clarify the present invention recited. To the

extent that this rejection may still apply to the original claims and amended claim 39, the rejection is respectfully traversed.

Claim 1 is directed to a method for generating information for inclusion in focus events. This information includes the target of the event and the "opposite" of the target of the event. For example, if the event is a FocusGained event, then the target is the component that is gaining focus and the "opposite" is the component that is losing focus. Similarly, if the event is FocusLost event, then the target that lost focus and the "opposite" is the component that gained focus. (*See e.g.,* Instant Specification [0039]). The "opposite" information corresponding to the event is typically stored in the opposite field associated with the event. As recited in claim 1, the method determines the "opposite" information by maintaining a list of components requesting focus and using the list to determine the "opposite" information and subsequently populate the "opposite" field.

To establish a *prima facie* case of obviousness "...the prior art reference (or references when combined) must teach or suggest all the claim limitations." (*See* MPEP §2142). The Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the claim limitations. Specifically, Brusky teaches a method for handling focus events in a PC/TV convergence system. The method taught in Brusky involves maintaining a focus list (222) of button press software handlers. When a focus event (*i.e.,* a button press) is received, a Remote Control Service Provider (RCSP) (210) traverses the list to find the first handler which is registered for the button that was pressed. (*See* Brusky, col. 8, ll. 40-52). In view of the above, Brusky fails to teach or suggest maintaining a list of focus events as Brusky only teaches maintaining a list of

10

focus handlers to service focus events.

Further, IBM does not teach what Brusky lacks. Specifically, IBM teaches a method for assigning specific keys to move focus using a table (*See e.g.,* IBM p.2). However, IBM does not teach or suggest maintaining a list of focus events or using the list of focus events to determine "opposite" information.

In view of the above, Brusky and IBM, whether considered separately or in combination, fail to teach or suggest the invention as recited in claim 1. Thus, the claim 1 is patentable over Brusky and IBM. Independent claim 39, amended, is also patentable for at least the same reasons as claim 1. Further, Dependent claims are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 14695.005001; P5114).

Respectfully submitted,

Date: _____

Jonathan P. Osha, Reg. No. 33,986
OSHA & MAY L.L.P.
One Houston Center, Suite 2800
1221 McKinney Street
Houston, TX 77010
Telephone: (713) 228-8600
Facsimile: (713) 228-8778

74761_1